



COUNTY OF LAKE PUBLIC WORKS DEPARTMENT

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G. R. Shaul
Public Works Director

June 14, 2005

Ms. Janis Cooke
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Subject: Amendments to the Water Quality Control Plan for the Sacramento River
and San

Joaquin River Basins For The Control of Mercury in Cache Creek, Bear
Creek, Sulphur Creek, and Harley Gulch, Colusa, Lake, and Yolo Counties

Dear Janis,

We have reviewed the subject documents, and offer the following comments:

- In the proposed Amendment, the section "Erosion Protection – Upper Watershed" requires the implementation of "the highest level of management practices to control erosion." The "highest level of management practices" is undefined. To be consistent with other storm water permits and for use of a defined term, we recommend the wording be revised to require the implementation of "best management practices".
- In the proposed Amendment, the section "Cache Creek, Bear Creek, and Harley Gulch" requires the monitoring of sediment to be in the silt/clay fraction. This section refers to the size being less than 65 microns. The proper size is less than 62.5, or 63, microns
- We are concerned that the soil and sediment monitoring parameters only include the silt/clay (<63 micron) fraction. Review of the data in Appendix D indicates significant portions of the mercury in the stream sediments are within the fine (63 micron – 1 mm) and coarse (1 – 2.8 mm) fractions of the sediment. In several locations, the mercury concentration in fine grain sediments is below the hot spot criteria, while the mercury concentrations in medium and course grain sediments are above the hot spot criteria. With the proposed sampling criteria, high concentrations of mercury in the medium and coarse grain sediments will be missed, and compliance may be assumed. We recommend the soil and sediment sampling required for mine and remediation projects include monitoring of all three sediment grain sizes.

If you have any questions, please call me at (707)263-2341.

Sincerely yours,

Thomas R. Smythe
Water Resources Engineer

cc: Patrick Morris, CVRWQCB

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